

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ARCHITECTURAL IRON WORKERS' LOCAL)	
NO. 63 WELFARE FUND, ARCHITECTURAL)	
IRON WORKERS' LOCAL NO. 63 DEFINED)	
CONTRIBUTION PENSION FUND,)	
ARCHITECTURAL METAL TRAINEE SCHOOL)	
FOR LOCAL NO. 63 AND THE IRON LEAGUE OF)	
CHICAGO, INC. and the ARCHITECTURAL and)	
ORNAMENTAL IRON WORKERS' UNION)	
LOCAL NO. 63,)	
)	Case No.: 20 CV 619
)	
Plaintiffs,)	Judge Pacold
)	
v.)	
)	
TMJ RAILING, INC.,)	
)	
Defendant.)	

Agreed Motion for Entry of Agreed Judgment Order

Plaintiffs, by its attorneys, Gregorio & Marco, move this Honorable Court to enter an Agreed Judgment Order against the Defendant, TMJ RAILING, INC., and in support states as follows:

1. Plaintiffs filed their Complaint on January 28, 2020 alleging that the TMJ Railing, Inc. failed to remit fringe benefits contributions to the Plaintiff Trust Funds.

2. The parties now have reached an agreement to resolve all matters in dispute. Pursuant to agreement, an agreed Judgment will be entered against the defendant, TMJ Railing, Inc.

3. TMJ Railing, Inc. and the Plaintiffs have agreed to have a Judgment entered against TMJ Railing, Inc. in the total amount of \$36,177.73 representing \$30,516.12 in unpaid fringe benefit contributions, \$3,051.61 in liquidated damages, and \$2,610.00 in attorney fees

which are collectable under the terms of the Collective Bargaining Agreement, Trust Agreements and Federal law (29 U.S.C. Section 1132(g)(2)(b)). A copy of the proposed Agreed Judgment Order is attached as **Exhibit 1** and is executed by counsel of record for TMJ Railing, Inc. and Mr. Ken Tardio, President of TMJ Railing, Inc.

WHEREFORE, Plaintiffs and Defendant, TMJ Railing, Inc. request that this Court enter an Agreed Judgment Order in the amount of \$36,177.73 against the Defendant, TMJ Railing, Inc.

By: /s/:Michael J. McGuire
Michael J. McGuire
One of the Attorneys for Plaintiffs

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